

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MARKET DOMINANT PRODUCT PRICES
INBOUND MARKET DOMINANT MULTI-SERVICE AGREEMENTS
WITH FOREIGN POSTAL OPERATORS

POSTNL - UNITED STATES POSTAL SERVICE BILATERAL
AGREEMENT (MC2010-35)
NEGOTIATED SERVICE AGREEMENT

Docket No. R2015-3

**UNITED STATES POSTAL SERVICE MOTION FOR LEAVE TO REPLY TO PUBLIC
REPRESENTATIVE COMMENTS ON POSTAL SERVICE NOTICE CONCERNING
TYPE 2 RATE ADJUSTMENT AND
ROYAL POSTNL BV NEGOTIATED SERVICE AGREEMENT
(December 5, 2014)**

The United States Postal Service moves for leave to respond to the comments filed by the Public Representative in this docket on December 2, 2014.¹ In his comments, the Public Representative challenges the Postal Service's assertion that the negotiated rates in the Royal PostNL BV – United States Postal Service Strategic Bilateral Agreement (2014 PostNL Agreement) improve the net financial position of the Postal Service. The Postal Service response that is the subject of this motion aims to explain the differences between the analyses and conclusions presented by the Public Representative and the Postal Service, and will assist the Commission in assessing the rates presented in this docket.

The Postal Service respectfully requests that the Commission grant this motion, and consider the United States Postal Service Comments in Response to Public Representative Comments on Postal Service Notice Concerning Type 2 Rate

¹ Public Representative Comments on Postal Service Notice Concerning Type 2 Rate Adjustment and Royal PostNL BV Negotiated Service Agreement, Docket No. R2015-3 (December 2, 2014).

Adjustment and Royal PostNL BV Negotiated Service Agreement filed concurrently with this motion.

Respectfully submitted,

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